UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DAVID AL-WATAN, TALAL CHOLAGH, ALI ALZEREJ, HASAN AL-ZEREJ, MOHAMMAD AL-SAEDY, HUSSEIN ALSALIH,

Plaintiffs,

v.

AMERICAN AIRLINES, INC.; JOHN DOE,

Defendants.
_______________________________________/

Case No. 2:07-cv-14687
HON. Paul D. Borman
Referral Judge: Steven R. Whalen

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DEFENDANT, AMERICAN AIRLINES, INC.'S ANSWER TO PLAINTIFFS' COMPLAINT

SPECIAL AND AFFIRMATIVE DEFENSES

RELIANCE UPON JURY DEMAND FILED BY PLAINTIFFS

NOW COMES Defendant, AMERICAN AIRLINES, INC. ("American Airlines"), only, by and through its attorneys, PHIFER & WHITE, P.C., and for its answer to Plaintiffs' Complaint, states as follows:

JURISDICTION AND PARTIES

1. In answering paragraph 1 of Plaintiffs' Complaint, Defendant American Airlines neither admits nor denies the allegations contained therein as they constitute legal conclusions not averments of fact, and thus, require no response.

2. In answering paragraph 2 of Plaintiffs' Complaint, Defendant American Airlines neither admits nor denies the allegations contained therein, being without sufficient knowledge and information upon which to form a belief as to the truths of the matters asserted therein.

3. In answering paragraph 3 of Plaintiffs' Complaint, Defendant American Airlines neither admits nor denies the allegations contained therein, being without sufficient knowledge and information upon which to form a belief as to the truths of the matters asserted therein.

4. In answering paragraph 4 of Plaintiffs' Complaint, Defendant American Airlines neither admits nor denies the allegations contained therein, being without sufficient knowledge and information upon which to form a belief as to the truths of the matters asserted therein.

5. In answering paragraph 5 of Plaintiffs' Complaint, Defendant American Airlines admits same.

6. In answering paragraph 6 of Plaintiffs' Complaint, Defendant American Airlines states the allegations contained therein constitute legal conclusions not averments of fact, and thus, require no response.

7. In answering paragraph 7 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

COMMON ALLEGATIONS

8. In answering paragraph 8 of Plaintiffs' Complaint, Defendant American Airlines admits same.

9. In answering paragraph 9 of Plaintiffs' Complaint, Defendant American Airlines admits same.

10. In answering paragraph 10 of Plaintiffs' Complaint, Defendant American Airlines admits same.

11. In answering paragraph 11 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

12. In answering paragraph 12 of Plaintiffs' Complaint, Defendant American Airlines states the allegations contained therein constitute legal conclusions, not averments of fact and require no response.

13. In answering paragraph 13 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

14. In answering paragraph 14 of Plaintiffs' Complaint, Defendant American Airlines admits that on August 28, 2007, Plaintiffs were in a public place of accommodation at the San Diego Airport (Lindbergh Field) and an American Airlines airplane. Defendant American Airlines denies the remaining allegations contained in paragraph 14.

15. In answering paragraph 15 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact. In further response, Defendant, American Airlines denies any discrimination against Plaintiffs.

16. In answering paragraph 16 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

17. In answering paragraph 17 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact. In further response, Defendant American Airlines denies that there was any discrimination.

18. In answering paragraph 18 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact. In further response, Defendant American Airlines denies that there was any discrimination.

19. In answering paragraph 19 of Plaintiffs' Complaint, Defendant American Airlines admits that the passengers of Flight 590 were requested to deplane. Defendant American Airlines denies the remaining allegations as being false, untrue and contrary to fact.

20. In answering paragraph 20 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

21. In answering paragraph 21 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

22. In answering paragraph 22 of Plaintiffs' Complaint, Defendant American Airlines neither admits nor denies the allegations contained therein, being without sufficient knowledge and information upon which to form a belief as to the truths of the matters asserted therein.

23. In answering paragraph 23 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

24. In answering paragraph 24 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

25. In answering paragraph 25 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

26. In answering paragraph 26 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

27. In answering paragraph 27 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

28. Defendant American Airlines neither admits nor denies the allegations of paragraph 28 of the Plaintiffs' Complaint, insofar as they allege the Plaintiff's damages. In further response to paragraph 28, Defendant American Airlines denies that it engaged in any unlawful or inappropriate actions.

29. Defendant American Airlines neither admits nor denies the allegations of paragraph 29 of the Plaintiffs' Complaint, insofar as they allege the Plaintiff's damages. In further response to paragraph 29, Defendant American Airlines denies that it engaged in any unlawful or inappropriate actions.

COUNT I

VIOLATION OF 49 USC §40127 – PROHIBITION ON DISCRIMINATION IN AIR TRANSPORTATION

30. Defendant American Airlines realleges and incorporates by reference each and every answer contained in paragraphs 1 through 29 in its answer to Plaintiffs' Complaint as though fully set forth herein.

31. In answering paragraph 31 of Plaintiffs' Complaint, Defendant American Airlines states the allegations contained therein constitute legal conclusions, not averments of fact, and require no response.

32. In answering paragraph 32 of Plaintiffs' Complaint, Defendant American Airlines states the allegations contained therein constitute legal conclusions, not averments of fact, and require no response.

33. In answering paragraph 33 of Plaintiffs' Complaint, Defendant American Airlines admits same.

34. In answering paragraph 34 of Plaintiffs' Complaint, Defendant American Airlines states that until John Doe is identified, Defendant can neither admit nor deny the allegations contained therein, being without sufficient knowledge and information upon which to form a belief as to the truths of the matters asserted therein.

35. In answering paragraph 35 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

36. Defendant American Airlines neither admits nor denies the allegations of paragraph 36 and its subparagraphs (a) through (e) of the Plaintiffs' Complaint, insofar as they allege the Plaintiff's damages. In further response to paragraph 36 and its subparagraphs (a) through (e), Defendant American Airlines denies that it engaged in any unlawful or inappropriate actions.

COUNT II

VIOLATION OF 42 USC §2000a – PROHIBITION AGAINST DISCRIMINATION OR SEGREGATION IN PLACES OF PUBLIC ACCOMMODATION

37. Defendant American Airlines realleges and incorporates by reference each and every answer contained in paragraphs 1 through 36 in its answer to Plaintiffs' Complaint as though fully set forth herein.

38. In answering paragraph 38 of Plaintiffs' Complaint, Defendant American Airlines neither admits nor denies the language contained in 42 U.S.C. §2000a, but affirmatively states that the statute speaks for itself.

39. In answering paragraph 39 of Plaintiffs' Complaint, Defendant American Airlines states the allegations contained therein constitute legal conclusions not averments of fact, and thus, require no response.

40. In answering paragraph 40 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

41. In answering paragraph 41 and its subparagraphs (a) through (e), Defendant American Airlines denies that its actions were in violation of law, and neither admits nor denies the Plaintiffs' allegations relative to their damages, being without sufficient information upon which to form a belief as to the truth of the matters asserted therein.

COUNT III

VIOLATION OF 28 USC §1983 – VIOLATION OF CIVIL RIGHTS UNDER COLOR OF STATE LAW

42. Defendant American Airlines realleges and incorporates by reference each and every answer contained in paragraphs 1 through 41 in its answer to Plaintiffs' Complaint as though fully set forth herein.

43. In answering paragraph 43 of Plaintiffs' Complaint, Defendant American Airlines states the allegations contained therein constitute legal conclusions, not averments of fact and require no response. To the extent that a response is required, Defendant American Airlines denies the same as false, untrue and contrary to fact.

44. In answering paragraph 44 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

45. In answering paragraph 45 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

46. In answering paragraph 46 and its subparagraphs (a) through (e), Defendant American Airlines denies that its actions were in violation of law, and neither admits nor denies the Plaintiffs' allegations relative to their damages, being without sufficient information upon which to form a belief as to the truth of the matters asserted therein.

COUNT IV

VIOLATION OF 42 USC §1981 –
DENIAL OF EQUAL RIGHTS UNDER THE LAW

47. Defendant American Airlines realleges and incorporates by reference each and every answer contained in paragraphs 1 through 46 in its answer to Plaintiffs' Complaint as though fully set forth herein.

48. In answering paragraph 48 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

49. In answering paragraph 49 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

50. In answering paragraph 50 and its subparagraphs (a) through (e), Defendant American Airlines denies that its actions were in violation of law, and neither admits nor denies the Plaintiffs' allegations relative to their damages, being without sufficient information upon which to form a belief as to the truth of the matters asserted therein.

COUNT VI

FALSE IMPRISONMENT

51. Defendant American Airlines realleges and incorporates by reference each and every answer contained in paragraphs 1 through 50 in its answer to Plaintiffs' Complaint as though fully set forth herein.

52. In answering paragraph 52 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

53. In answering paragraph 53 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

54. In answering paragraph 54 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

55. In answering paragraph 55 of Plaintiffs' Complaint, Defendant American Airlines states the allegations contained therein constitute legal conclusions not averments of fact, and thus, require no response.

56. In answering paragraph 56 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

57. In answering paragraph 57 of Plaintiffs' Complaint, Defendant American Airlines denies same as being false, untrue and contrary to fact.

58. In answering paragraph 58 and its subparagraphs (a) through (e), Defendant American Airlines denies that its actions were in violation of law, and neither admits nor denies the Plaintiffs' allegations relative to their damages, being without sufficient information upon which to form a belief as to the truth of the matters asserted therein.

COUNT VII

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

59. Defendant American Airlines realleges and incorporates by reference each and every answer contained in paragraphs 1 through 58 in its answer to Plaintiffs' Complaint as though fully set forth herein.

60. In answering paragraph 60 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

61. In answering paragraph 61 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

62. In answering paragraph 62 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

COUNT VIII

NEGLIGENCE

63. Defendant American Airlines realleges and incorporates by reference each and every answer contained in paragraphs 1 through 62 in its answer to Plaintiffs' Complaint as though fully set forth herein.

64. In answering paragraph 64 of Plaintiffs' Complaint, Defendant American Airlines need not respond to the legal conclusions drawn therein, but further asserts in response that Defendant complied with each and every legal duty which may have been owing to Plaintiff.

65. In answering paragraph 65 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

66. In answering paragraph 66 of Plaintiffs' Complaint, Defendant American Airlines denies the same as being false, untrue and contrary to fact.

WHEREFORE, Defendant, American Airlines, Inc. requests that this Court dismiss the Plaintiffs' claims and award American Airlines, Inc., costs and attorney fees, and further relief as may be appropriate.

Respectfully submitted,

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Attorneys for Defendant, American Airlines, Inc.

DATED: November 29, 2007

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SPECIAL AND AFFIRMATIVE DEFENSES

NOW COMES Defendant, AMERICAN AIRLINES, INC. (American Airlines), by and through its attorneys, PHIFER & WHITE, P.C., and for its Special and Affirmative Defenses, states as follows:

FIRST AFFIRMATIVE DEFENSE

1. The actions of the captain of Flight 590 were permitted because he reasonably relied upon information given to him, which information caused him to have a reasonable belief that the Plaintiffs were or may have posed a risk to the security of the flight.

SECOND AFFIRMATIVE DEFENSE

2. The actions of the captain of Flight 590 were not arbitrary and capricious, were taken in accordance with the duties imposed upon him by Federal Law, and pursuant to 49 U.S.C. § 44902 are not actionable.

THIRD AFFIRMATIVE DEFENSE

3. The actions of American Airlines were not the result, in whole or in part, of any unlawful discrimination prohibited by 42 U.S.C. § 1981 and 42 U.S.C. § 2000a.

FOURTH AFFIRMATIVE DEFENSE

4. Plaintiffs cannot establish that American Airlines or any of its employees acted with deliberate discriminatory intent.

FIFTH AFFIRMATIVE DEFENSE

5. Pursuant to 42 U.S.C. § 2000d, Plaintiffs have failed to establish that American Airlines' actions were supported by state action.

SIXTH AFFIRMATIVE DEFENSE

6. Plaintiffs' allegations have failed to establish that American Airlines' actions were intentional, wanton, malicious, callous or show reckless disregard to Plaintiffs' civil rights.

SEVENTH AFFIRMATIVE DEFENSE

7. Plaintiffs' Complaint fails to state a claim upon which relief can be granted.

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EIGHTH AFFIRMATIVE DEFENSE

8. Plaintiffs' Complaint is barred by virtue of the Doctrine of Estoppel, Doctrine of Latches, Doctrine of Waiver and/or the Doctrine of Unclean Hands.

NINTH AFFIRMATIVE DEFENSE

9. Defendant American Airlines, at all times relevant hereto, acted reasonably and in good faith, and with due care for the rights and safety of the Plaintiffs and their property.

TENTH AFFIRMATIVE DEFENSE

10. The alleged occurrence was not caused by the acts or omissions of Defendant, American Airlines.

ELEVENTH AFFIRMATIVE DEFENSE

11. Defendant American Airlines did not breach any duty owed to the Plaintiffs.

TWELTH AFFIRMATIVE DEFENSE

12. Any recovery by the Plaintiffs is barred because the Plaintiffs failed to mitigate any alleged injuries or damages sustained by the Plaintiffs.

THIRTEENTH AFFIRMATIVE DEFENSE

13. Defendant American Airlines complied with all the provisions of the Federal Aviation Act, its predecessors, its progeny and the rules and regulations promulgated pursuant thereto.

FOURTEENTH AFFIRMATIVE DEFENSE

14. If any of Plaintiffs' claims relate to rates, routes or services as set forth in 49 U.S.C. § 41713(b)(I), then Plaintiffs' claims are preempted by same.

FIFTEENTH AFFIRMATIVE DEFENSE

15. The Federal Aviation Act 49 U.S.C. § 40101, et. seq., including but not limited to 49 U.S.C. § 44902 and § 44941, and the regulations and tariffs promulgated thereunder

implicitly preempt and/or preclude any State law or other standards governing flight operations and security and boarding procedures related thereto.

SIXTEENTH AFFIRMATIVE DEFENSE

16. If Plaintiffs were injured as alleged in their Complaint, said injury was caused by the failure of Plaintiffs to exercise reasonable care for their own persons and civil rights, and that such failure was the direct and approximate cause of their injuries, if any.

SEVENTEENTH AFFIRMATIVE DEFENSE

17. Defendant American Airlines is not liable under the theory of *respondeat* superior.

EIGHTEENTH AFFIRMATIVE DEFENSE

18. The individual employees acted properly and therefore can not be held liable for any injuries sustained.

NINETEENTH AFFIRMATIVE DEFENSE

19. Defendant American Airlines' actions did not constitute false arrest or false imprisonment.

TWENTIETH AFFIRMATIVE DEFENSE

20. Defendant American Airlines' actions or omissions did not arise to constitutional violations, specifically violations of 42 U.S.C. § 1981 or § 1983.

TWENTY-FIRST AFFIRMATIVE DEFENSE

21. Defendant American Airlines' actions did not arise to a violation of 49 U.S.C. § 40127.

TWENTY-SECOND AFFIRMATIVE DEFENSE

22. Defendant American Airlines' actions did not arise to a violation of 42 U.S.C. § 2000a.

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TWENTY-THIRD AFFIRMATIFE DEFENSE

23. All actions taken by Defendant American Airlines were proper and for the protection of its passengers and as such, were not extreme, outrageous, intentional or reckless.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

24. Plaintiffs' allegations failed to establish the cause of action under the theory of intentional infliction of emotional distress, and as such, it cannot recover.

RESERVATIONS OF AFFIRMATIVE DEFENSES

That Defendant American Airlines reserves any other Special and/or Affirmative Defenses which may be available to it pursuant to the Federal Rules of Civil Procedure and upon completion of discovery.

Respectfully submitted,

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Attorneys for Defendant, American Airlines, Inc.

DATED: November 29, 2007

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RELIANCE UPON JURY DEMAND FILED BY PLAINTIFFS

NOW COMES Defendant, American Airlines, Inc., by and through its attorneys, PHIFER & WHITE, P.C., and hereby relies upon the jury demand previously filed in this matter by the Plaintiff.

Respectfully submitted,

BY: s/Randolph D. Phifer

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Attorneys for Defendant, American Airlines, Inc.

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CERTIFICATE OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

RANDOLPH D. PHIFER, hereby certifies that on the 29th day of November, 2007, he electronically filed *DEFENDANT, AMERICAN AIRLINES, INC.'S ANSWER TO PLAINTIFFS' COMPLAINT; SPECIAL AND AFFIRMATIVE DEFENSES; RELIANCE UPON JURY DEMAND FILED BY PLAINTIFFS; and CERTIFICATE OF SERVICE,* with the following:

Clerk of the Court
U.S. District Court – Eastern District
Theodore Levin United States Courthouse
231 West Lafayette Blvd.
Detroit, Michigan 48226

using the ECF system which will send notification of such filing to the following:

Mr. Lawrence T. Garcia
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